

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**ROOT, INC., et al.,**

**: Case No.: 2:23-cv-00512**

**Plaintiffs, : Judge Sarah Morrison**

**v.**

**: Magistrate Judge Chelsey Vascura**

**BRINSON CALEB “BC” SILVER, et :  
al.,**

**:**

**Defendants.**

**MOTION TO WITHDRAW AS COUNSEL**

Now come attorneys David M. Scott and Aaron M. Jones, of the law firm Brennan, Manna & Diamond, and hereby respectfully move the Court for leave to withdraw as counsel of record for Defendants, Brinson Silver, Eclipse Home Design, LLC, and Collateral Damage, LLC (“Defendants”), pursuant to Local Rule 83.4(b) and Rule of Professional Conduct 1.16(a) and 1.16(b). Counsel submit that professional considerations require termination of their representation of Defendants. Contemporaneously with this Motion, Counsel have filed a request for a 21-day extension of time, to June 1, 2023, for Defendants to move or plead. This request is made to ensure Defendants would have ample time to secure new representation and file responsive pleadings. Counsel have informed Defendants of all upcoming hearings and deadlines in this matter, including the scheduled hearing at 3:00 p.m. on Friday, May 12, 2023. Counsel has provided a copy of this Motion to Withdraw to Defendants and all other parties, in compliance with Local Rule 83.4(b). Pursuant to the Court’s oral instructions, the undersigned have confirmed that Mr. Silver’s

criminal counsel does not intend to enter an appearance in this civil matter. Accordingly, the undersigned respectfully move to withdraw as counsel for Defendants Brinson Silver, Eclipse Home Design, LLC, and Collateral Damage, LLC.

Respectfully submitted,

/s/ Aaron M. Jones

David M. Scott (0068110)

Aaron M. Jones (0096386)

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*Attorneys for Defendants Brinson Caleb "BC"*

*Silver Eclipse Home Design, LLC and*

*Collateral Damage, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of May 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy was also sent by ordinary U.S. Mail, postage prepaid, to the following:

Paige McDaniel  
5576 Alexanders Lake Road  
Stockbridge, GA 30281

/s/ Aaron M. Jones

Aaron M. Jones (0096386)

4884-9829-4609, v. 2